

Message

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Sent: 7/25/2014 10:22:41 PM
To: Julie Vandermost [JVandermost@vcsenvironmental.com]; Tracey Brownfield [tracey@landveritas.com]; Nate Bello [bello@wra-ca.com]; Tim DeGraff [degraff@wra-ca.com]
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Subject: Corps comments (UNCLASSIFIED)
Attachments: Ecoregions_SoCal_Omernik Level IV_85.gif; Ecoregions_SoCal_Omernik Level IV_8.gif; Peterson Ranch bank_service area_v02_L4 ecoregions_v02.pdf

Classification: UNCLASSIFIED

Caveats: NONE

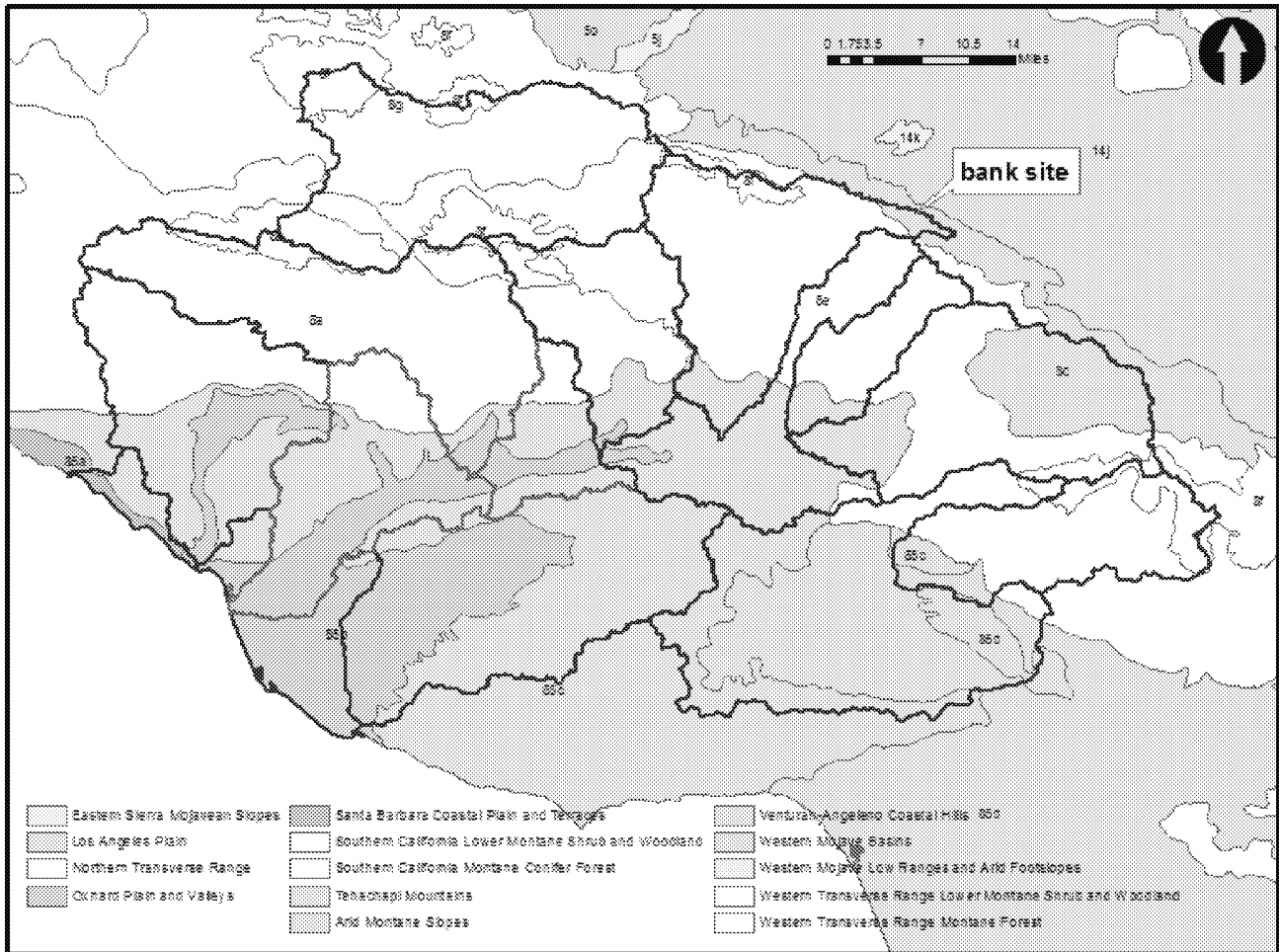
Good afternoon,

I apologize for the delay in getting these comments to you. I believe Paul copied you on his comments already, but below are Corps comments (in bold).

***Corps comment #5/WRA response: To our knowledge, the IRT has not agreed on buffer numbers. Are you basing these buffers on what was used for Soquel?**

***Corps comment #6/WRA Response: The new SA map doesn't show all the Omernik Level IV (most detailed) ecoregions, So Dan created a map that does (below and attached). For example, the bank site appears to be within or near 8c (Arid Montane Slopes) and/or possibly 8e (SoCal lower montane shrub and woodland). The current proposed SA (primary = red, secondary = blue, tertiary = purple) shows that level IV ecoregion varies quite a bit within the proposed service area. Although I'm not that familiar with these ecoregions, it seems some of these are substantially different from those of the bank site itself. We should consider whether all these should be in the SA. For example, the upper LA HUC is mostly Los Angeles Plain (probably very different) whereas the Big Tujunga Creek HUC is mostly SoCal lower montane shrub and woodland which is contained by or at least near the bank site. The Sespe Creek HUC, the northern part of the Upper Piru Creek and Ventura River HUCs, and the coastal HUCs are also different in terms of ecoregion. [please note: the attached ecoregion gifs show the codes together with text names, but the colors do not match my map below]**

Peterson Ranch SA (as in sponsor's 7/15 IRT meeting submittal) with Omernik level IV ecoregions.



*Corps Comment #13/WRA Response: "The wetlands highlighted in yellow indicate very low-functioning wetlands. Low functioning wetlands proposed for preservation only (PO) may not be creditable." This statement hasn't been addressed in your response, but it should be addressed in the BEI. We would likely question an attempt to get PO credit for any of the low-functioning wetlands as they would not seem to meet the Mitigation Rule criteria for preservation.

*Corps Comment #16/WRA Response: The "Exclusion Areas" map in attachment 5 should be labeled to match the site descriptions in the text of the PETERSEN RANCH SITE BANK BOUNDARY page of attachment 5. How will the excluded sites with buildings be used? What potential effects could those uses have on the bank property (traffic? Noise disturbance? Etc.). How will the groundwater recharge and extraction activities described in attachment 5 affect the hydrology of the bank property? This is a potential problem that could impact the bank's aquatic resources and should be analyzed in detail.

*EPA comment 17/WRA Response: It's unclear where you are proposing to allow grazing, but any grazing within aquatic resource areas, buffer areas, or even upland areas that contribute sheet flow or groundwater to downstream aquatic resources would seem to be contradictory to the bank purpose. We would argue grazing should not be allowed within the bank property at all.

*USFS comment 1A/WRA Response: This easement issue would need to be resolved prior to the CE being finalized.

*Regarding Attachment 7 Restoration designs (figure 5 on page 57 and "Rift Valley Restoration Plan" figure on page 108): The mitigation plans in the BEI should support the depicted mitigation methods, both in the proposed restoration work and the performance standards (including functional lift).

Thank you and have a good weekend,
Bri

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